

# **EXHIBIT B**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re: :  
IN RE TERRORIST ATTACKS ON : Docket #03md1570  
SEPTEMBER 11, 2001 :  
: September 14, 2021  
New York, New York  
-----:

PROCEEDINGS BEFORE  
THE HONORABLE SARAH NETBURN,  
UNITED STATES MAGISTRATE JUDGE

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With regard to the scheduling issues that are presently before the Court, the Government believes that it would be in the interests of justice to extend the expert discovery deadline at least to allow the Government to complete declassification reviews of the closing EC and the materials previously processed by the FBI in this case.

In accordance with the executive order, the Government intends to complete the declassification review of these documents within 60 days or by November 2. It's our understanding that some or all of the parties may rely in their expert disclosures on records that were previously produced in part by the FBI and the FBI anticipates releasing substantial additional information in those records as a result of the review. We, therefore, believe it would be appropriate and in the interest of justice for all parties to have the benefit of that additional information in preparing their expert disclosures.

With regard to the question whether the Court should extent the expert discovery deadline pending the completion of the review of the other categories of record covered by the executive order, the Government certainly would not oppose such an extension, particularly given that the purpose of the Government's review is to permit disclosure of additional information. I would add that the